

DRAFT

CLOSURE PLAN

MACDERMID INCORPORATED
5439 San Fernando Road West
Los Angeles, California 90039

EPA ID #CAD 010707222

Submitted to:
Mr. Kenneth Hughes
Surveillance and Enforcement Unit
Southern California Section
Toxic Substances Control Division
Department of Health Services
107 South Broadway, Room 7011
Los Angeles, California 90012

Prepared by:
McKesson Environmental Services, Inc.
1252 Quarry Lane
Pleasanton, California 94566
(415) 426-2600

DRAFT

1.0 INTRODUCTION

MacDermid Incorporated (MacDermid) manufactures and distributes specialty chemicals for the metal finishing industry and printed circuit industry. The facility's name, address and EPA ID number are as follows:

MacDermid Incorporated
5439 San Fernando West
Los Angeles, California 90039

EPA ID #CAD 010707222

This facility serves as a warehouse and distribution center for specialty chemicals.

In 1981 the California Department of Health Services (CDHS) granted the facility Interim Status as a Storage Facility for recyclable materials. MacDermid's routine business practice with regard to these materials was to accept certain spent material for reclaiming, recycling and redistribution. Immediately upon receipt of the materials, MacDermid transferred them to a separate company on adjacent property, Sunland, for storage and/or processing. In addition, MacDermid stored small quantities of laboratory waste at the MacDermid facility. As part of the permitting process, CDHS requested MacDermid to submit an Operation Plan within a specified time period.

In 1982 CDHS exempted two of the three recyclable materials handled by MacDermid, spent chromic acid solutions and spent ammoniacal copper solutions, from the hazardous waste permitting requirements (Appendix A), but MacDermid did not relinquish its Interim Status. At this point MacDermid should have completed and submitted the Operation Plan because the facility still received one manifested non-exempt waste, spent solder strippers and solder conditioner materials, for immediate transfer to the company on the adjacent property. MacDermid neglected to complete and submit the Operation Plan, in large part because MacDermid did not intend to continue even this receipt and transfer, but was instead pursuing the acquisition of other property for storage prior to reclamation or transfer to a reclamation/recycling facility.

In 1985, EPA's finalization of its RCRA rules for "Hazardous Wastes Known as Recyclable Materials" negated the state exemptions for spent chromic acid solutions and spent ammoniacal copper solutions, subjected hazardous wastes that are recyclable to the requirements for generators, transporters and storage facilities under 40 CFR, and thereby made voidable the exemptions from the manifesting system and permitted waste transportation system that MacDermid and Sunland had previously obtained.

DRAFT

By December 31, 1985, the facility no longer received recyclable materials. There was no longer any need to use the warehouse as a storage or transfer facility because MacDermid's business practices had changed. The company had been reorganized in such a way that the Los Angeles premises were used only as a warehouse for distribution of products; a marketing agreement had been entered into whereby a company in Sante Fe Springs, Southern California Chemical Company (SCC), manufactured, recycled, and reclaimed the material; and spent chromic acid solutions were no longer recycled. Therefore, and in preparation for compliance with California Assembly Bill No. 2166, MacDermid instructed its customers to manifest the material, use a permitted hauler, and ship the material directly to SCC, which is a TSDF with Interim Status.

MacDermid realized that even though it had not ever stored recyclable materials on its property and by 1985 did not even receive them, it was necessary under the RCRA regulations to change MacDermid's status from that of an Interim Storage Facility to that of Generator because of MacDermid's storage of laboratory waste. One requirement for this change of status would be a Closure Plan as required by California Administrative Code, Title 22, Article 23, Section 67210, even though recyclable material had never been physically stored on the premises. Subsequently, upon proceeding with the above, the CDHS then inspected the MacDermid site in February of 1986. MacDermid was cited for several violations. In response to the Notice of Violations, MacDermid sent to CDHS a Compliance Schedule, and has been and is taking the necessary steps to meet the schedule.

McKesson Environmental Services, Inc. (MES) has been retained by MacDermid to develop a proper Closure Plan for submission to the CDHS. This Closure Plan will describe the steps necessary to close the hazardous waste storage area in a manner that eliminates the need for further maintenance. This will be accomplished by ensuring that all hazardous waste and hazardous constituents are removed from the facility.

DRAFT

2.0 FACILITY DESCRIPTION

The MacDermid facility consists of a warehouse measuring approximately 200 feet by 100 feet. MacDermid leases the warehouse from Sunland Chemical (Sunland), which occupies the area immediately adjacent to the north and west of MacDermid's facility (A diagram of the site is shown in Fig. 2.0). MacDermid and Sunland entered into a business agreement whereby Sunland became a contract compounder for MacDermid. As part of MacDermid's business, certain products which are originally manufactured by MacDermid or its contract compounder are recycled/reclaimed.

Waste known as recyclable materials handled by MacDermid are as follows:

- Spent chromic acid solutions;
- Spent ammoniacal copper solutions;
- Spent solder strippers and solder conditioner materials.

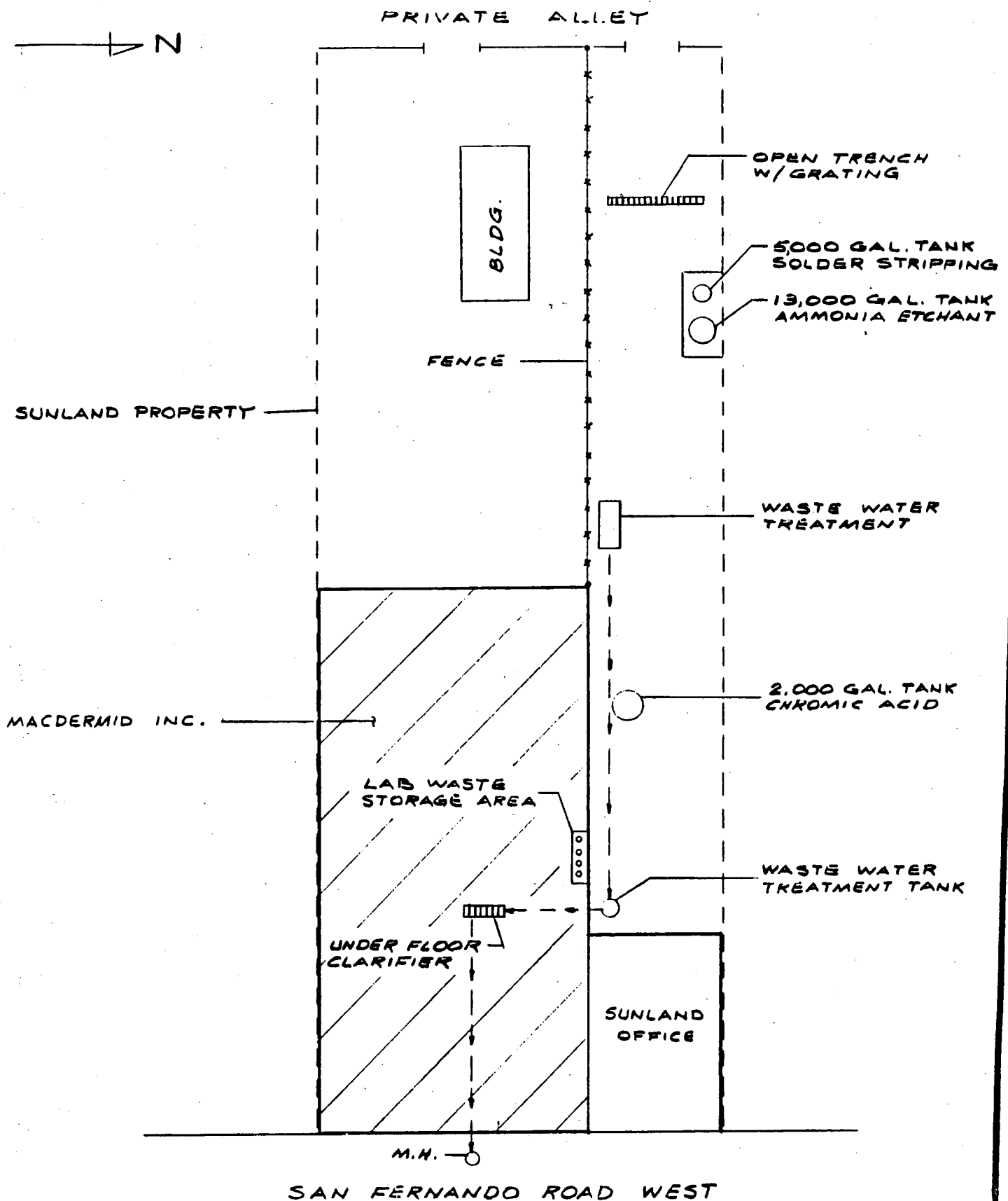
The waste materials received from MacDermid's customers were immediately transferred to storage and/or processing equipment on Sunland's property. The solder stripper/conditioners were stored in a 5,000-gallon tank. The chromic acid solution was placed in a 2,000-gallon lead-lined processing tank (this was the only material Sunland recycled - see letter dated June 4, 1982 to Sunland from CDHS attached). The ammonia etchant was stored in a 13,000-gallon tank (The containers are shown on Fig 2.0).

Laboratory wastes resulting from the testing of MacDermid's customer's nickel plating solutions, zinc plating solutions and other heavy metal plating solutions were stored on MacDermid's premises.

2.1 Current Facility Status

Hazardous waste received by MacDermid included the three types of spent chemicals specified in the above section. These wastes were stored for transshipment on Sunland's premises. Only the chromic acid solution was recycled at Sunland. Any and all remaining recyclable materials that remained on Sunland's premises after January 1, 1986 have been disposed of properly by using manifests and having the material transported to a TSDF. None of the three spent chemicals - chromic acid solution, ammoniacal copper solution, or solder stripper/conditioner material - were or are stored, treated or disposed of at MacDermid's warehouse.

The only waste material currently on the actual MacDermid premises are laboratory wastes which are disposed of in accordance with appropriate hazardous waste disposal methods, using manifests and being transported to an approved hazardous waste disposal facility.



McKesson

McKesson Environmental Services

MACDERMID INCORPORATED
5439 SAN FERNANDO RD. WEST
LOS ANGELES, CALIF. 90039

DRAWN BY: BS
CH'K'D BY:

NOV. 26, 1986

Fig. 2.0

SCALE: NONE

DRAFT

3.0 CLOSURE ACTIVITIES

Hazardous wastes other than the laboratory wastes noted previously have not been stored at MacDermid's facility. There are no hazardous waste constituents on this site which require removal or clean-up for closure of a Storage Facility; therefore, MacDermid considers this facility closed. MacDermid wishes to relinquish its interim status as a TSDF and revert to a simple generator status.

In order to assure that hazardous waste and hazardous waste constituents do not exist on MacDermid's premises under Storage for a TSD Facility, MacDermid will obtain a California Registered Engineer to visually survey the site and inspect the warehouse to verify the current status of the facility is as represented herein.

3.1 Closure Report

Upon completion of the engineer's inspection, a closure report will be prepared and submitted to CDHS. The report will contain the engineer's verification of the current status of the facility.

3.2 Certification of Closure

When closure is completed, certification by the owner and operator of the facility and by an independent registered professional engineer that the facility has been closed in accordance with the specification in the approved Closure Plan will be provided to CDHS.

NOTE: Chrome, copper and solder stripper/conditioner solutions referred to in this Plan as "hazardous wastes" were, prior to January 1, 1986, properly classified as "recyclable material". As indicated in the attached letters from CDHS, the material was exempted from the hazardous waste hauler and hazardous waste manifest system.

DRAFT

4.0 SCHEDULE

Upon approval of the Closure Plan by CDHS, the Plan will be implemented in accordance with the following schedule:

Days following CDHS
Approval of Closure Plan

Activity

30 Days

Engineer's certificate
provided to CDHS

DRAFT

5.0 COSTS

The costs presented below are the estimated costs for implementing this Closure Plan. These costs are based on the assumption that the facility status is as indicated in this Plan.

Closure Costs

- Site Survey	\$ 600.00
- Closure Report	<u>\$ 1,000.00</u>
TOTAL ESTIMATED CLOSURE COSTS	\$ 1,600.00

DRAFT

APPENDIX A

Clayton Environmental Consultants, Inc.

1252 Quarry Lane • Pleasanton, California 94566 • (415) 426-2600

#7622-ES

April 8, 1987

Mr. John Hinton
Chief, Permitting Unit
Southern California Section
Toxic Substances Division
Department of Health Services
107 South Broadway, Room 7011
Los Angeles, CA 90012

RE: MacDermid, Inc. Closure Plan

Dear Mr. Hinton:

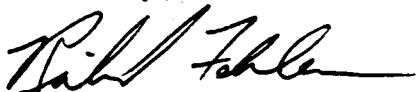
On December 14, 1986, Clayton (formerly McKesson Environmental Services) submitted a draft Closure Plan for the MacDermid, Inc. facility (EPA ID#CAD010707222) to your office, to the attention of Mr. Ken Hughs. This plan was the final item to be submitted in accordance with a compliance schedule approved by DOHS.

On April 4, 1987, I spoke with Mr. Hughs to determine the status of the Closure Plan. He informed me that the plan had been lost, and requested that another copy be submitted to your attention. Per that request, I have attached a copy of our original submission.

We look forward to receiving your comments concerning this plan. MacDermid wishes to implement the plan and resolve the matter as soon as possible.

Please let me know if you have any questions.

Sincerely,



Richard Fehler
Manager, Regulatory Affairs

cc: Ken Hughs, DOHS
Cherrie D. Gillis, MacDermid, Inc.

b:e73lrf.1tr

McKesson

December 14, 1986

7622-ES

Mr. Kenneth Hughes
Surveillance & Enforcement Unit
Southern California Section
Toxic Substances Division
Department of Health Services
107 South Broadway, Room 7011
Los Angeles, CA 90012

RE: MACDERMID, INC. CLOSURE PLAN

Dear Mr. Hughes:

Attached is the draft copy of MacDermid's Closure Plan. As you know, finalization of the closure plan is the final item on MacDermid's compliance schedule.

Please let me know if you have any questions concerning this submission. I will be looking forward to receiving your comments.

Sincerely,



Richard Fehler
Manager, Regulatory Affairs

cc: Cherrie Gillis
MacDermid, Inc.
Anne Rogers
Nutter, McLennon & Fish
Julian Gresser
Nutter, McLennon & Fish

RF/kw
368